

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

JEAN JONES

*Plaintiff,*

v.

PORTFOLIO RECOVERY  
ASSOCIATES, LLC and WESTERN  
SURETY COMPANY

*Defendants.*

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CASE NO. 1:16-cv-00572-RP

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE SUPPLEMENTAL  
EXHIBITS IN SUPPORT OF MOTIONS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendants Portfolio Recovery Associates, LLC (“PRA”) and Western Surety Company (“Western”) (together “Defendants”) by and through counsel and files this Unopposed Motion for Leave to File Supplemental Exhibits in Support of Motions and will show onto this Court as follows:

**I.**

1. Defendants filed their Renewed Motion for Judgment as a Matter of Law and Motion for New Trial with this Court (the “Motions”). Docs. 89 & 90. These Motions are based on the trial transcript from the trial conducted on August 29, 2017, before this Court. Defendants had ordered two transcripts from the Court, one of which contained only the trial transcript itself (the “trial transcript”), and one of which contained the pretrial conference, voir dire, and trial transcript (the “complete transcript”). The Motions contain citations to the trial transcript while the complete transcript was attached. Defendant now files this Motion for Leave to clarify the citations and the record.

2. Attached to this Motion as Exhibit A is a copy of the trial transcript, which corresponds to the page numbers found in Defendants' Motions.

3. Defendants offer the following tables of corrections to clarify the page citations:

Motion for New Trial:

Original Page Cite	Corrected Page Cite
40-41	120-122
45:10	126:6
48:18-22	129:15-19
69:15-23	150:15-23
69:24-70:19	150:24-151:19
110:1-7	191:1-7
113:17-19	194:17-19
114	195
133	214

Renewed Motion for Judgment as Matter of Law:

Original Page Cite	Corrected Page Cite
32-33	113-114
48:18-22	129:15-19
69:15-23	150:15-23
69:24-70:19	150:24-151:19

4. Defendants have also attached these tables as a separate Exhibit B for the convenience of the Court.

## II.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request this Court grant this Motion for Leave.

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Respectfully submitted,

**MALONE AKERLY MARTIN PLLC**

/s/ Robbie Malone

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***COUNSEL FOR DEFENDANTS***

**CERTIFICATE OF CONFERENCE**

On October 19, 2017, counsel for Defendants conferred with counsel for Plaintiff regarding this motion. Plaintiff is unopposed.

/s/ Xerxes Martin

Xerxes Martin

[CERTIFICATE OF SERVICE ON NEXT PAGE]

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this document has been forwarded **via CM/ECF** on this 19th day of October, 2017, to:

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